

THE CITY OF REVERE, MASSACHUSETTS

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OFFICE OF THE CITY SOLICITOR

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Thomas G. Ambrosino
Mayor

July 5, 2005

James S. Dilday, Esq.
Grayer & Dilday, LLP
27 School Street, Suite 400
Boston, MA 02108

Re: Pechner-James, et al., v. City of Revere, et al.
USDC MA Case No. 03-12499-MLW

Dear Mr. Dilday:

Enclosed herewith you will find my clients' opposition to your Rooker-Feldman "Request" with accompanying affidavit which I have sent to the Court for filing. Also enclosed herewith you will find my clients' motion for Rule 11 sanctions with accompanying affidavit which I have not sent to the Court for filing in light of the 21 day safe harbor provisions of Rule 11. Should you fail to withdraw the Rooker-Feldman "Request" within the 21 day safe harbor period, which I calculate ends on Friday, July 29, 2005, (July 5 to 26 being 21 days plus 3 days for mailing), I will file the motion with the Court.

In light of Rule 11's 21 day safe harbor pre-filing requirement, it is also my intention that service of this motion upon you shall serve as my effort to meet and confer to narrow or resolve the issues as required by Local Rule 7.1(a)(2).

Thank you for your attention to this matter. I await your reply. Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Walter H. Porr, Jr.", is written over a horizontal line.

Walter H. Porr, Jr.
Assistant City Solicitor

Cc: Michael J. Akerson, Esq.